

***WENDRICKS v. ANNA SERRES, et al., Eastern District Case No. 20-CV-1189***  
**Attorney's Fee Breakdown Chart**

Case Review/General Communications with Client/Counsel [65.6 hrs – Pltfs' reduced 2.7 hrs]	<b>62.9 Hours</b>
Intraoffice Communications [76.35 hrs – Pltfs' reduced 29 Hrs]	<b>47.35 Hours</b>
Deposition of Client ( <i>Deposition 2 hrs / Prep 23.2 hrs / No Travel</i> ) [25.2 hrs – Pltfs' reduced .4 hrs]	<b>24.8 Hours</b>
▪ Wendricks 02/02/24 (10:00 – 12:00)	
Deposition of Officer Defendants ( <i>Depositions 16 hrs / Prep 42.5 hrs / Travel 16 hrs</i> ) [67.4 hrs – Pltfs' reduced 10 hrs as duplicative]	<b>57.4 Hours</b>
Two Attorneys billed 10 hrs <b>each</b> on 02/08 (4 hours travel and 6 hours depositions) 1. Officer Algiers 02/08/24 (9:03 – 10:29) 1.6 hours 2. Officer Elfman 02/08/24 (11:38 – 1:25) 1.8 hours 3. Officer Reetz 02/08/24 (1:58 – 2:49) .9 hours (9am – 3pm = 6 hours)	
Two Attorneys billed 8 hrs <b>each</b> on 02/09 (4 hours travel and 4 hours depositions – wrote off 8 hours as duplicative) 4. Officer Walker 02/09/24 (9:00 – 10:34) 1.6 hours 5. Officer Carlson 02/09/24 (11:17 – 12:26) 1.2 hours (9am – 12:30 pm = 3.5 hours)	
Deposition of Expert ( <i>Discovery Dep 1.0 hrs / Prep 17.8 hrs &amp; Trial Dep 2.5 / Prep 16.7 hrs</i> )	<b>38.0 Hours</b>
▪ Tina Houston Discovery Dep 08/08/24 (12:16 – 12:52) .7 hrs ▪ Tina Houston Trial Dep 08/09/24 (1:46 – 3:56) 2.2 hrs	
Expert Communications/Report	<b>30.1 Hours</b>
Motion to Strike Defendants' Experts ( <i>Moving Brief 19.2 hours / Reply Brief 12.9 hours</i> )	<b>32.1 Hours</b>
Trial Preparation	<b>186.6 Hours</b>
▪ <i>Jury Instructions/Special Verdict/Voir Dire – 4.6 hours</i> ▪ <i>Motions in Limine – 68.4 hours</i> ▪ <i>Other – 113.6 hours</i>	
Court Appearances [15.3 hrs – Pltfs' reduced 4.5 hrs as duplicative and .8 research]	<b>10.0 Hours</b>
Trial (3 days – 2 Attorneys) [55 hrs – Pltfs' reduced 2.5 hrs waiting for verdict]	<b>52.5 Hours</b>
Discussions with Court/Motions for Cost Reimbursement [12.9 hrs – Pltfs' reduced .1 hrs]	<b>12.8 Hours</b>

DATE	TIME KEEPER	HOURS	CHARGE	TASK
9/20/2023	36	.1	0.0	Signed up for pro bono case, sent e-mail to Eastern District of Wisconsin pro bono staff attorney. ( <i>No Charge</i> )
9/21/2023	24	.2	85.0	Review recruitment order; review docket.
9/22/2023	36	.6	132.0	"Spoke with Eastern District of Wisconsin clerk, read through documents, discussed plan with Brian T. Fahl."
9/26/2023	36	.4	88.0	Wrote letter to client, sent out conflicts check.
9/26/2023	24	.3	127.5	Review letter to Wendricks in care of his State probation officer.
10/2/2023	36	.3	66.0	Spoke with client, discussed expectations, rough timeframe, etc.
10/3/2023	36	.2	44.0	E-mail correspondence to client.

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10/5/2023	36	3.0	660.0	Read case file prepared by Erin E. Kandziora; reviewed prior excessive use of force case in firm's files; began list for what documents will be needed and what questions we will ask.
10/11/2023	36	.3	66.0	Discussion with client over phone, set up dropbox for him to upload discovery materials.
10/23/2023	36	2.5	550.0	Reviewed records client provided; read summary judgment, complaint, response.
10/24/2023	36	2.5	550.0	"Continued review of client's case files; need to request more information, seems like discovery documents may be missing, e-mailed client."
10/25/2023	36	1.5	330.0	"Review of documents, e-mail correspondence to client scheduling visit, discussion with Brian T. Fahl concerning scheduling."
10/30/2023	24	.3	127.5	"E-mail correspondence and meeting with Wesley E. Haslam to discuss timing for meeting with Wendricks."
10/30/2023	35	.2	44.0	"Review and revise notice of appearance and have same filed with the court; conference with Wesley E. Haslam to discuss case and possible meeting with client next week."
11/1/2023	24	1.8	765.0	Review docket and summary judgment briefing and order in preparation for meeting with client.
11/6/2023	24	.2	85.0	"E-mail correspondence and phone call to Federal Defender Services to allow us use of conference room to meet with client."
11/7/2023	35	4.8	1056.0	Review entire file to assess what other documents needed and prepare for client meeting.
11/7/2023	36	2.8	616.0	"Reviewed files, prepared for meeting with client, discussions with Brian T. Fahl and Andrea N. Panozzo concerning strategy, what we need, and how much time we have."
11/8/2023	24	5.0	2125.0	Travel to Green Bay and back; meet with Client with Andrea N. Panozzo and Wesley E. Haslam. <i>(Reduced by .6 hours)</i>
11/8/2023	35	5.0	1100.0	"Drive time there back to Green Bay (4 hours); meeting with client to discuss case, introduce selves, and discuss next steps (1 hour)."
11/8/2023	36	5.0	1100.0	Traveled to Green Bay to meet with client, returned and made outline for next tasks.
11/8/2023	36	2.2	484.0	"Conducted research on excessive use of force involving tasers in Wisconsin and 7th Circuit; found cases that cut both ways, learned that violations of police procedures does not make conduct unreasonable."
11/14/2023	35	.6	132.0	"Locate previous criminal attorney so that we can contact and obtain file; begin looking through documents to locate hospital and doctor that saw him to get medical records and see if they have any photos of injuries."
11/14/2023	36	.5	110.0	"Reviewed discovery documents we have and created list for what we need prior to status conference on the November 20th."
11/15/2023	36	.6	132.0	"E-mail correspondence to opposing counsel, discussion with Andrea N. Panozzo, and brief review of documents we still need to obtain."
11/16/2023	24	2.1	0.0	"Review summary judgment briefing, review prior use of force expert report; research excessive force standards." <i>(No Charge)</i>
11/20/2023	24	1.3	212.5	"Legal research regarding prior use of force expert and jury instructions from Alvarado case; Attend Status conference in Wendricks." <i>Only charge for .5 (reduced from 552.5 to 212.5)</i>
11/20/2023	35	.8	176.0	"Preparation for and attendance at telephonic status conference in Judge Pepper court; discuss matter and next steps with Wesley E. Haslam and Brian T. Fahl."

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11/20/2023	36	1.0	220.0	"Attendance at status conference; next conference set for 12/19; debrief with Brian T. Fahl and Andrea N. Panozzo on next steps and timeline."
11/20/2023	36	.5	110.0	Spoke with opposing counsel about access to discovery documents; scheduling, and expert witnesses; discussion with Andrea N. Panozzo and Brian T. Fahl concerning experts and depositions.
11/20/2023	36	.5	110.0	Use of force expert research, reviewed 7th Circuit case law and expert report from prior case.
11/27/2023	35	.7	154.0	"Telephone conference with Tina Houston regarding use of force expert for case; look into reimbursement rules in pro bono cases and process; research law surrounding depositions entering into trial for the officer that may be deployed; send e-mail correspondence with all information to Brian T. Fahl and Wesley E. Haslam."
12/4/2023	24	.9	0.0	Correspondence with Andrea N. Panozzo regarding expert expenses in Pro Bono cases. <i>(No Charge)</i>
12/4/2023	35	.5	110.0	"Review materials that could be sent to use of force expert; send internal e-mail correspondence about conversation with use of force expert and any special process to hire her; e-mail correspondence to expert and ask if she can provide an estimate for services because we will have to ask for court permission if over \$1k."
12/6/2023	35	1.0	220.0	"Draft motions for approval for expert on use of force to eventually file with the court for payment reimbursement."
12/7/2023	35	.5	110.0	Finish drafting motions and send to Brian T. Fahl and Wesley E. Haslam.
12/14/2023	35	.3	66.0	"Conference with Wesley E. Haslam to discuss matter and upcoming status conference; put together medical authorization form to be signed by client and then send to opposing counsel for medical records."
12/15/2023	24	.6	255.0	Review and edit motion for expenses in pro bono case.
12/15/2023	35	.3	66.0	Conference to discuss deposition dates and fill out reimbursement form for expert.
12/18/2023	24	.4	0.0	Correspondence regarding scheduling of depositions. <i>(No Charge)</i>
12/18/2023	35	.5	110.0	"Conference with Wesley E. Haslam to discuss tomorrow's status conference; finalize deposition date for client and discuss other dates for officers."
12/18/2023	36	.2	44.0	"Schedule depositions with opposing counsel; discussion with Andrea N. Panozzo; e-mail correspondence with client setting up date for January 29th."
12/19/2023	24	.3	127.5	Telephone call with Wesley E. Haslam regarding scheduling conference.
12/19/2023	35	.7	154.0	Preparation for status conference; attend phone status conference.
12/19/2023	36	.6	132.0	Attendance at status conference.
12/19/2023	36	.3	66.0	Discussion with opposing counsel concerning deposition dates, trial dates and times.
12/19/2023	36	2.0	440.0	"Reviewed expert report from prior case, attempt to schedule depositions for 5 officers and Terrell Wendricks."
12/27/2023	24	.3	127.5	Correspondence regarding the scheduling of depositions.
12/27/2023	36	.5	110.0	"Discussion with opposing counsel about scheduling depositions, relayed information to Wendricks team and coordinated days to go to Green Bay."
1/3/2024	24	.5	220.0	E-mail correspondence regarding scheduling depositions.
1/11/2024	36	2.6	715.0	Preparation of questions for Plaintiff's deposition.

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1/16/2024	35	.3	82.5	"Conference with Wesley E. Haslam to discuss what needs to be done in case; telephone call and leave voicemail to Tina Houston regarding expert opinion."
1/18/2024	36	.4	110.0	Set up time with client for deposition preparation; reviewed documents.
1/19/2024	36	.4	110.0	Scheduling depositions with team and client.
1/23/2024	36	3.2	880.0	Prepared questions for deposition for officers and for client's prep session tomorrow.
1/24/2024	35	1.4	385.0	Zoom meeting with client for deposition preparation; discuss case with Wesley E. Haslam and Brian T. Fahl; telephone call with expert regarding status of depositions and will be sending her materials.
1/24/2024	36	3.3	907.5	"Met with client for deposition prep; discussed deposition times and dates with team, client, and with opposing counsel."
1/29/2024	35	.5	137.5	Begin putting together documents to send to expert.
1/29/2024	36	2.5	687.5	"Reviewed audio files for dissemination to expert; reviewed deposition procedures via secondary source for deposition on Friday."
1/30/2024	35	.5	137.5	"Look through documents to ensure it has all necessary information to send to expert; e-mail correspondence to Kimberly S. Vitrano for help putting documents into link to send to expert; send link to expert along with case information."
1/30/2024	36	1.5	412.5	Reviewed deposition procedures for Terrell Wendricks' deposition on Friday.
1/30/2024	56	.4	90.0	Preparation of link with documents and audio files for expert review; e-mail correspondence to and from Andrea N. Panozzo regarding same.
1/31/2024	24	.3	132.0	"Conference with Wesley E. Haslam discussing deposition prep, e.g., proper bases for objections, types of follow-up questions, etc."
1/31/2024	36	2.3	632.5	"Prepared for deposition through review of record and review of deposition procedures via secondary source; corresponded with opposing counsel; Erin E. Kandziora prepared Notices, sent to opposing counsel and received confirmation they would be forwarded."
1/31/2024	61	.5	100.0	Prepare drafts of Notices of Deposition for Anna Algers, Lucy Elfman, Rodney Reetz, Aaron Walker and Alexzander Carlson; e-mail correspondence with Wesley E. Haslam regarding notices.
2/1/2024	35	2.5	687.5	"Conference with Wesley E. Haslam to discuss case regarding deposition tomorrow and officers' deposition next week; review file in preparation for client deposition tomorrow."
2/1/2024	36	1.2	330.0	Deposition preparation with client; reviewed materials for deposition tomorrow.
2/2/2024	35	2.0	550.0	Represent client during deposition.
2/2/2024	36	2.5	687.5	discussed documents and recordings with opposing counsel; debriefed client; discussed upcoming officer depositions with Andrea N. Panozzo and Brian T. Fahl. <b><i>"(removed deposition--2 hrs, \$550. Kept post deposition actions)"</i></b>
2/5/2024	24	.8	352.0	"Conference with Wesley E. Haslam to discuss health records and e-mail correspondence regarding the same; discuss deposition prep."
2/5/2024	36	4.5	1237.5	"Prepared to depose officers; compiled all police reports and organized by officer; began preparing questions."
2/6/2024	35	4.0	1100.0	Review documents and outline for officers' depositions.

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2/6/2024	36	4.0	1100.0	Preparation for officer depositions, discussed with Andrea N. Panozzo; reviewed case file.
2/7/2024	24	.9	396.0	"Review correspondence with excessive force expert; discuss depositions with Wesley E. Haslam and Andrea N. Panozzo."
2/7/2024	35	2.0	550.0	Continue preparation for officers' depositions.
2/7/2024	36	4.5	1237.5	Reviewed audio of altercation with police; created timeline to ask defendants questions during depositions; prepared police reports; prepared further questions; met with Andrea N. Panozzo and discussed gameplan; corresponded with opposing counsel concerning the use of the audio.
2/8/2024	35	10.0	2750.0	Drive time to Green Bay; depose Officers Serres, Elfman, and Reetz.
2/8/2024	36	10.0	2750.0	Travel to Green Bay (4 hours round trip); took depositions of three defendants.
2/9/2024	35	8.0	2200.0	Drive time to Green Bay; depose Officers Carlson and Walker.
2/9/2024	36	8.0	0.0	Travel to Green Bay (4 hrs round trip); took depositions of Carlson and Walker. <i>(Removed as duplicative)</i>
2/12/2024	36	2.0	550.0	Reviewed all documents because it was clear at depositions that opposing counsel had documents we did not have; reviewed documents sent by Terrell Wendricks' prior criminal attorney.
2/13/2024	24	.7	308.0	Review correspondence between Wesley E. Haslam and defense counsel.
2/13/2024	36	2.2	605.0	"Review journal article concerning excessive use of force and the relevance/admissibility of policy in trial; [removed for work product]"
2/15/2024	36	.9	247.5	"Briefed client on depositions of defendants; inquired about recording client had on telephone and other evidence he had mentioned; discussed procedures on expert report and testimony with Andrea N. Panozzo and Brian T. Fahl."
2/16/2024	36	.6	165.0	Reviewed deposition transcripts received in e-mail correspondence.
2/19/2024	24	3.2	1408.0	Review documents for use of force expert.
2/19/2024	35	.4	110.0	"Reviewed transcripts received from depositions, sent to expert for her review and date that we have to disclose her report."
2/20/2024	24	1.6	704.0	Review Wendricks deposition transcript; review use of force sheet and full police report.
2/20/2024	35	1.0	275.0	"E-mail correspondence with expert and sending taser documents; discuss with Wesley E. Haslam to make sure that the taser documents we have are the correct documents; send to expert additional transcripts from depositions and use of force documents that indicate which taser belonged to each officer."
2/20/2024	36	2.3	632.5	Review transcripts from depositions.
2/21/2024	24	.6	264.0	Review officer taser reports.
2/22/2024	24	1.3	572.0	Review Green Bay Use of Force Policy.
2/23/2024	35	.3	82.5	Correspondence with expert - sent Green Bay use of force policy.
2/28/2024	35	.3	82.5	E-mail correspondence with expert regarding court's understanding of facts and issues.
2/29/2024	36	1.2	330.0	"Reviewed taser reports; searched web for information about the clicking sound to verify Officer Carlson's assertion that the sound means the taser is not as effective."
3/4/2024	24	1.2	528.0	Review use of force expert opinion.

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3/4/2024	36	3.2	880.0	Read Officers' deposition transcripts.
3/5/2024	24	.6	264.0	Conference regarding expert report.
3/5/2024	35	2.5	687.5	"Reviewed expert report and discussed with Wesley E. Haslam; discuss with Wesley E. Haslam and Brian T. Fahl [removed for work product]"
3/5/2024	36	2.5	687.5	Read expert report; discussed with Andrea N. Panozzo.
3/6/2024	35	1.1	302.5	Telephone conference with expert to talk regarding draft report.
3/6/2024	36	2.0	550.0	"Telephone call with expert witness going over her report, read remainder of Alexander Carlson deposition transcript, reviewed Anna Serres transcript."
3/8/2024	35	.9	247.5	Review expert report; discuss with Wesley E. Haslam and Brian T. Fahl for disclosure requirements.
3/8/2024	36	2.2	605.0	"Reviewed expert report, suggested cosmetic changes and spoke with expert; read corrected report and sent to opposing counsel."
3/12/2024	24	.2	88.0	Review letter from defense requesting expert.
3/14/2024	24	.6	264.0	Review reimbursement request.
3/14/2024	35	1.5	412.5	Edit and file reimbursement motion for expert.
3/14/2024	36	.2	55.0	Conference regarding expert's CV
3/20/2024	36	.7	192.5	Reviewed documents sent by opposing counsel, downloaded everything from dropbox; addressed response from opposing counsel on recording Terrell Wendricks testified to during depositions.
3/22/2024	36	.1	27.5	E-mail correspondence and telephone call to client requesting documents.
3/25/2024	36	.2	55.0	Telephone conference with client to discuss missing recording that opposing counsel is requesting and documents he was supposed to produce for us; informed client about expert report.
3/27/2024	35	.8	220.0	"Look through documents sent to expert and pinpoint which ones we did not provide; send e-mail correspondence to expert asking for those documents."
3/27/2024	36	.1	27.5	"Reviewed expert e-mail correspondence and opposing counsel request for documents used by expert in report."
3/28/2024	35	.8	220.0	"Correspondence with opposing counsel re: materials experts used; e-mail correspondence to expert and discussion with Wesley E. Haslam."
3/28/2024	36	.3	82.5	"Conference regarding requests for documents used by our expert by opposing counsel with Andrea N. Panozzo; review."
4/4/2024	24	.6	264.0	Review court order on expense motions.
4/8/2024	36	1.0	275.0	Reviewed items still needed from client; asked client again to send information; began collating depositions and pinpointing what facts are consistent and which are not; sent invoices to accounting for payment, pulled up Wisconsin Eastern District payment forms and filled out, did not submit yet (have until 60 days after case ends, but will submit sometime in the next week or so).
4/9/2024	36	.5	137.5	Reviewed billing from transcripts and discussed with accounting; pulled reimbursement forms from Eastern District of Wisconsin website; filled out known portions and reviewed local rules.

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4/10/2024	36	.1	27.5	"Review timelines and requested information from client; have been asking for certain items for months and have not received anything."
4/15/2024	36	.6	165.0	"Completed forms for reimbursement; telephone call with Cream City Reporting to see what was still owed and get refund for late penalties."
4/30/2024	24	.8	352.0	Review expert disclosures discuss with Andrea N. Panozzo.
4/30/2024	35	.3	82.5	Review expert disclosure from opposing counsel.
5/1/2024	24	.6	264.0	Conference regarding non-retained experts with Wesley E. Haslam and whether to object.
5/1/2024	35	.5	137.5	"Conference with Wesley E. Haslam to discuss expert disclosure and whether the non-retained no report experts are allowed."
5/1/2024	36	3.1	852.5	Research on expert witnesses regarding required reports, non-retained experts, hybrid experts, federal rules; e-mail correspondence to opposing counsel informing them that I would be objecting to their use of non-reporting witnesses unless they could show some factual nexus with the case.
5/2/2024	36	1.0	275.0	"Reviewed own expert's report, will use as basis for arguing that we are prejudiced by the opposing counsel using experts disguised as hybrid witnesses to avoid the cost and disclosure of a proper expert report; discussed with Andrea N. Panozzo."
5/6/2024	24	.6	264.0	"Review e-mail correspondence with Tina Houston regarding testifying and e-mail correspondence with defense counsel regarding experts."
5/6/2024	35	1.0	275.0	Conference with Wesley E. Haslam to discuss case and experts.
5/6/2024	36	3.2	880.0	Reviewed court schedule; e-mail correspondence to opposing counsel to inform them that I would be objecting to their non-retained experts; pulled case law that supported the position that only non- retained experts that participated in the relevant events may avoid the expert report; forwarded information to opposing counsel along with request to explain their experts' association with the case, discussed with other attorney's briefly, continued to research Rule 26 disclosures; confident in objection and will give opposing side a few days to respond before filing objection.
5/7/2024	36	.3	82.5	"Andrea N. Panozzo received quote from expert for testimony, discussed and reviewed possibility of getting more reimbursement from court."
5/9/2024	36	.3	82.5	"Reviewed Rules of evidence in preparation for trial, refreshed knowledge on admissibility of certain lines of questioning (e.g., hypotheticals to lay witnesses)."
5/15/2024	35	.2	55.0	"Conference with Wesley E. Haslam and objection to opposing counsel's experts and expert disclosure - will review the objection."
5/15/2024	36	4.4	1210.0	Worked on motion to strike expert witnesses; pulled case law; completed outline and most of brief.
5/17/2024	35	.3	82.5	Conference with Wesley E. Haslam to discuss case and upcoming trial.
5/20/2024	36	.8	220.0	Worked on motion to strike, added section on language.
5/24/2024	36	1.0	275.0	Worked on drafting brief in support of motion to strike experts.
5/28/2024	24	1.6	704.0	Review and revise brief in support of motion to strike.
5/28/2024	35	.6	165.0	Reviewed objection to experts draft; discuss with Wesley E. Haslam.

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5/28/2024	36	3.8	1045.0	"Completed draft of brief in support of motion to strike experts; discussed with Andrea N. Panozzo; discussed with Brian T. Fahl; revised."
5/29/2024	36	1.9	522.5	"Revised and edited brief and motion to strike; sent to Erin E. Kandziora to file; discussion with Andrea N. Panozzo concerning motions in limine; discussion with Brian T. Fahl concerning edits I made to motion to strike."
5/31/2024	36	.4	110.0	Review motion to strike in anticipation of response from opposing counsel.
6/19/2024	36	1.5	412.5	Reviewed response brief from opposing party; began drafting reply.
6/20/2024	35	.9	247.5	"Conference with Wesley E. Haslam to discuss reply from opposing counsel and to dos on case as we approach trial."
6/20/2024	36	6.0	1650.0	"Reviewed response brief by defense counsel; began drafting reply brief; discussion with Brian T. Fahl and Andrea N. Panozzo concerning case; telephone conversation with defense counsel regarding lost recording and other pretrial matters."
6/21/2024	36	1.6	440.0	"Review of documents sent by opposing counsel; telephone discussion concerning spoilation of evidence with prior counsel; discussion with client informing him of opposition's stance on lost recording; worked on reply brief."
6/24/2024	24	1.8	792.0	Review and revise reply brief in support of motion to strike expert witnesses.
6/24/2024	36	5.0	1375.0	"Draft reply brief; discussed settlement numbers with client; discussed motions in limine with Brian T. Fahl; reviewed jury instructions provided by opposing counsel."
6/25/2024	24	1.3	572.0	Review defendants proposed jury instructions, special verdict and motions in limine.
6/26/2024	36	2.1	660.0	"Received jury instructions, pretrial report, and motions in limine from opposing counsel; reviewed all and discussed with Brian T. Fahl; completed draft of reply brief; reviewed past jury instructions and motions in limine for other excessive use of force cases."
7/2/2024	36	2.5	687.5	"Reviewed jury instructions, special verdict form, motions in limine; discussed with Brian T. Fahl; prepared notes for meeting with opposing counsel."
7/5/2024	36	.4	110.0	Review oppositions motions in limine.
7/8/2024	24	.5	220.0	Conference regarding attempting to get expert funds from court for expert testimony.
7/8/2024	35	.8	220.0	"Conference with Wesley E. Haslam and got updates on the case regarding motions in limine, upcoming trial, talk with client, and talks with opposing counsel."
7/8/2024	36	6.0	1650.0	Draft motions in limine, discussion concerning pretrial report, witness and exhibit lists and stipulations.
7/9/2024	35	.4	110.0	Discussed expert issue and not having enough money to pay for testimony with Brian T. Fahl; said we should submit a sealed motion and ask for more - also sent e-mail correspondence to expert and made sure she is free all the days of trial currently. Sent an e-mail correspondence to previous associate at firm that used this expert to set up a call and ask how she was on the stand.
7/9/2024	36	5.4	1485.0	Draft motion in limine for admissibility of prior criminal record including some charges arising from the evening of the incident.

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7/10/2024	35	.4	110.0	"Read through the rules for reimbursement on pro bono cases to consider as part of motion to request additional funds."
7/11/2024	24	.8	352.0	Review Wesley E. Haslam draft motions in limine and suggest edits.
7/11/2024	35	1.3	357.5	Review motion in limine to be filed today and review opposing side draft motion in limine; <i>meeting with previous associate who had also hired Tina Houston for advice on testimony and how she was on stand</i> ; discuss matter with Wesley E. Haslam; review motion in limine filed by opposing counsel.
7/11/2024	36	5.7	1567.5	Work on motions in limine, pretrial issues, discussion with opposing counsel.
7/12/2024	35	2.0	550.0	Draft motion to ask court for additional expenses to be granted for testimony by expert; reviewed rules; sent to Brian T. Fahl and Wesley E. Haslam for edits; made edits and filed.
7/15/2024	35	1.2	330.0	"Reviewed the motions in limine and took notes of things we should contest; e-mail correspondence to Wesley E. Haslam with thoughts on responses."
7/15/2024	36	5.4	1485.0	Work on response to opposition's Motions in Limine.
7/16/2024	36	4.3	1182.5	Work on responses to oppositions motions in limine; discussion concerning pretrial matters.
7/17/2024	35	1.4	385.0	"Reviewed jury instructions, draft pretrial report, researched voir dire questions and draft and send to Wesley E. Haslam, telephone call with Wesley E. Haslam."
7/17/2024	36	6.0	1650.0	Finalize responses to opposing party's motions in limine; worked on pretrial report; discussion with opposing counsel; completed witness and exhibit list.
7/18/2024	35	7.5	2062.5	Research and draft response to expert motions in limine; review all other filings.
7/18/2024	36	7.2	1980.0	Finalize all motions in limine responses, pretrial report and all attachments including jury instructions, stipulations, etc.
7/19/2024	36	.5	137.5	Discussion with client; discussion with Andrea N. Panozzo and Brian T. Fahl concerning next steps.
7/22/2024	35	.5	137.5	"Conference with Wesley E. Haslam regarding upcoming pre-trial and discussed meeting with client tomorrow and what we should cover with him."
7/22/2024	36	3.1	852.5	Review motions to strike Defendants' expert witness in preparation for hearing on Thursday; prepare speaking outline; review other materials.
7/23/2024	24	.9	396.0	Meeting with Andrea N. Panozzo and Wesley E. Haslam to discuss what they need to do to prepare for pretrial conference; forward cross-examination videos to Wesley E. Haslam and Andrea N. Panozzo.
7/23/2024	35	1.0	275.0	"Internal meeting with Wesley E. Haslam and Brian T. Fahl about what to prepare for the pretrial and what to ask client in meeting tomorrow and how certain trial issues will occur and research that needs to be done regarding evidence and admissibility."
7/23/2024	36	6.0	1650.0	Research ordinary course of business exception to allow taser logs in; review source Trial Technique and Evidence in preparation for trial; review trial materials provided by Brian T. Fahl; preparation for final pretrial by reviewing motions in limine and collating materials.
7/24/2024	35	3.0	825.0	Telephone conference with client to again ask about lost recording and get details surrounding about it for preparation of pre-trial and was able to spark his memory of places it could be and eventually he found a copy

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**Attorney's Fee Breakdown Chart**

				and sent to us; discussed deposition transcripts and motions in limine arguments; create outline for motions in limine arguments.
7/24/2024	36	5.2	1430.0	Discussion with client regarding trial, preparation, and evidentiary issues; discussed missing recording with client and he was able to locate the file; sent file to opposing counsel.
7/25/2024	24	1.5	0.0	Attendance at Final Pretrial Conference with Andrea N. Panozzo and Wesley E. Haslam. <i>(No Charge)</i>
7/25/2024	35	3.0	825.0	Preparation for hearing; participated in hearing in Judge Pepper's court.
7/25/2024	36	6.4	935.0	Review filings, organize paperwork, and consult with team in preparation for final pretrial hearing; attend final pretrial hearing (10:00 a.m. -11:30 a.m.); discussion with team addressing court's holdings and preparation for opposition's filing regarding expert witness; review Officer Lucy Elfman's transcript. <i>(reduced by 3 hrs for having two attorneys at hearing)</i>
7/26/2024	35	1.8	495.0	Conference with Wesley E. Haslam to discuss admissibility of the taser logs and how to get them in through business judgment rule; go through all expert documents; send e-mail correspondence to expert to reserve her; receive email back that she was just diagnosed with a serious medical condition and had to take leave and will be unable to testify; discuss problem internally and come up with plan to ask client if he would want to move forward, ask more details from expert, and then depending on answers, move for continuance.
7/26/2024	36	4.5	1237.5	Discussion with Andrea N. Panozzo concerning court's approval of expert witness cost; prepare information for opposing counsel based on pretrial conference; prepare arguments against striking our expert; review depositions to provide an order for the witnesses at opposing counsel's request; received notice from our expert that she had a serious medical condition and would not be able to testify, looked into viability of a stay.
7/29/2024	35	.5	137.5	Conference with Wesley E. Haslam regarding what to do moving forward after expert said that she is sick; discuss with Wesley E. Haslam that opposing counsel suggested trial deposition; e-mail correspondence expert to see if she is available for a phone call; talk with Wesley E. Haslam about officers' line up for testimony.
7/30/2024	35	.4	110.0	Attempt to call expert because have not received e-mail correspondence back regarding a phone call; sent e-mail correspondence to expert with topics I want to discuss with her (her experience in preparation for the motion and possibility of trial deposition or recommendation for someone else to hire if we ask the court to push the trial date) and that I have tried calling and can't get a hold of her.
7/30/2024	36	1.7	467.5	Draft outlines for examinations of officers.
7/31/2024	35	2.0	550.0	Conference with Wesley E. Haslam to discuss case and current problems; try to call expert witness and did not get a hold of her, send her multiple e-mail correspondence; review and discuss motion to strike expert with Wesley E. Haslam and how to respond.
7/31/2024	36	3.0	825.0	Review motion to dismiss expert from opposing counsel; discuss with Andrea N. Panozzo; planned response, but still waiting on communications from Tina Houston (expert) to see if she can testify in some capacity.
8/1/2024	35	2.3	632.5	Attempt to call expert again and write questions to ask on her experience, still can't get a hold of her, discuss what to do with Wesley E. Haslam; called client with Wesley E. Haslam to update him that we have not been able to get a hold expert and if he would still want to ask to push trial if we don't get a hold of her; end up getting call from expert and having conversation about her doing a trial deposition and then conversation re:

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**Attorney's Fee Breakdown Chart**

				her experience to respond to defendants' motion to exclude her on Daubert; review stipulation drafted by Wesley E. Haslam to send to opposing counsel regarding expert trial deposition.
8/1/2024	36	5.3	1457.5	Telephone conference with expert witness, research Rule 32 and draft stipulation for FRCP 32 deposition, prepare outlines for expert deposition, work with Erin E. Kandziora on deposition scheduling.
8/2/2024	35	5.0	1375.0	Go through all emails with expert to put into file to send to opposing counsel; go through all documents to put in file to send to opposing counsel; discuss matter and response to motion with Wesley E. Haslam; review first draft of response to motion; draft e-mail correspondence to expert to give her summary of what she can and cannot testify to based on motions in limine; review exhibit list to make sure everything is listed.
8/2/2024	36	5.9	1622.5	Revise stipulation, discuss with opposing counsel; arrange for trial deposition and expedited transcript; obtain profile list and begin research into jury pool; begin draft of brief in opposition to motion to exclude our expert witness.
8/2/2024	56	1.5	337.5	E-mail correspondence to and from Erin E. Kandziora regarding juror list; research potential jurors; assist Andrea N. Panozzo with preparation of link to expert materials.
8/2/2024	61	1.5	300.0	Conference with Kimberly S. Vitrano and Lee R. Grey regarding juror pool research; e-mail correspondence to Kimberly S. Vitrano and Lee R. Grey with names for search; begin researching jurors on Facebook Instagram, X, CCAP, etc.
8/3/2024	36	5.2	1430.0	Begin draft of brief in response to motion to strike testimony of expert; prepare outline for questions for expert Tina Houston's trial deposition; trial preparation, prepare outlines for witnesses/parties Anna Serres and Lucy Elfman.
8/4/2024	35	1.0	275.0	Reviewed and added details/ more indepth redlines/comments to reply to motion to exclude expert.
8/5/2024	35	1.2	330.0	Telephone conference with opposing counsel to discuss the links I sent her and other matters for trial plus trial deposition of expert; e-mail correspondence to expert with more questions regarding from opposing counsel; discuss what needs to be completed with Wesley E. Haslam.
8/5/2024	36	4.8	1320.0	Complete draft of response to motion to strike testimony of Tina Houston; trial preparation.
8/5/2024	56	5.7	1282.5	Research potential jurors and preparation of juror profile summary; e-mail correspondence to team with juror profiles; conference with Wesley E. Haslam regarding findings.
8/5/2024	61	1.5	300.0	Continue work on jury research.
8/6/2024	35	2.6	715.0	Conference with Wesley E. Haslam to discuss what needs to get done; create declaration for our reply to defendant's motion to exclude and make edits to our reply.
8/6/2024	36	6.6	1815.0	Complete draft response to defendants' motion to bar expert testimony, complete declarations; complete stipulation for FRCP 32 signed by both parties; discussion with expert; write questions for expert witness testimony; scheduled meeting with Tina Houston.
8/6/2024	61	1.0	200.0	Continue work on jury research.
8/7/2024	24	1.8	792.0	"Meeting with Andrea N. Panozzo and Wesley E. Haslam to discuss trial prep and Tina Houston's unavailability."

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**Attorney's Fee Breakdown Chart**

8/7/2024	35	9.0	2475.0	Telephone conference with expert to discuss trial deposition to take place next day; review deposition transcripts of officers; discuss with Wesley E. Haslam regarding what needs to be done before trial and finalize who will question each officer; begin outlines for direct of Wendricks and review his deposition and notes with him.
8/7/2024	36	10.0	2750.0	Trial preparation; prepare for deposition with expert, prepare exhibits, begin outlines for witnesses, work on basic theme with Andrea N. Panozzo; prepare initial closing statements; review evidentiary rules as they pertain to the evidence of the case.
8/7/2024	56	1.3	292.5	Research potential jurors; e-mail correspondence to and from Erin E. Kandziora regarding same.
8/8/2024	24	1.6	704.0	"Review court's proposed draft venire and voir dire questions; review court order on motion to exclude testimony and related opinions."
8/8/2024	35	8.0	2200.0	Attendance at trial deposition of expert Tina Houston and discovery deposition of Tina Houston; ran out of time during deposition and had to make calls with expert to figure out additional scheduling; create draft motion in event unable to schedule another time to finish trial deposition to admit the testimony into evidence; continue trial prep and review of depositions and police reports.
8/8/2024	36	10.6	1265.0	Complete deposition preparation; meet with expert witness prior to deposition; meet with opposing counsel; opposing counsel conducted discovery deposition; conduct trial deposition; arranged for subsequent deposition and expedited transcripts due to error by court reporter; prepare witness outlines.
8/8/2024	56	5.4	1215.0	Research potential jurors; preparation of report on same; send report to Erin E. Kandziora.
8/8/2024	61	.75	150.0	Conference with Wesley E. Haslam regarding trial exhibits; prepare trial exhibits.
8/9/2024	24	3.6	1584.0	Meeting with Wesley E. Haslam and Andrea N. Panozzo to discuss witness outlines; review evidence to be admitted; discuss the process of entering documents into evidence, how to refresh recollection and how to impeach with prior statements; review juror profiles.
8/9/2024	35	7.0	1925.0	Conference with Wesley E. Haslam to discuss review questions for expert testimony, and prepare for part two of trial deposition; during deposition become aware of possible problem with experience of expert; call with expert after deposition to discuss e-mail correspondence that opposing counsel brought up; research for documentation on the taser use for DLNR; discussions with Leila N. Sahar and Brian T. Fahl regarding the e-mail correspondence opposing counsel used in the trial deposition and advise on how to handle; call with client to set up meeting time before trial and ask if he has any question.
8/9/2024	36	12.4	3410.0	Conduct second trial deposition; review e-mail correspondence provided by opposition claiming to support expert was committing perjury; telephone call with expert, obtained a reasonable explanation; conduct cursory review of DLNR public documents; work on trial prep materials, outlines and collating evidence.
8/10/2024	35	12.0	3300.0	"Trial preparation; continue outlines for Wendricks direct and officer Carlson outline direct - review his deposition transcript; review video and place timestamps on certain parts of the video/audio; incorporate video into direct; incorporate taser logs into direct."
8/10/2024	36	5.5	1512.5	Conduct trial prep - meet with Andrea N. Panozzo, send Brian T. Fahl outlines for review, review materials and applicable rules.

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**Attorney's Fee Breakdown Chart**

8/11/2024	35	9.0	2475.0	"Trial preparation; complete outline for officer Walker; received and reviewed motion from defendants regarding exclude expert testimony and discussed with Wesley E. Haslam; complete outline for opening and practice opening."
8/11/2024	36	8.4	2310.0	Preparation for trial; pre-trial visit with client; preparation of outlines for examinations/cross examinations.
8/11/2024	36	4.1	1127.5	Review motions by opposing counsel to strike expert witness based on extrinsic information; review rules cited; review brief; prepare counter-argument; pull public legislative documents impeaching the defendants' argument for their motion to strike; review deposition transcripts and compare with allegations the expert committed perjury; conclude the expert did not perjure herself.
8/12/2024	24	1.6	704.0	"Review and revise Andrea N. Panozzo's opening statement; Attend Jury Trial; discuss strategy with Wesley E. Haslam and Andrea N. Panozzo during breaks; discuss day 2 testimony with Andrea N. Panozzo and Wesley E. Haslam." (Reduced from 10.6 to 1.6 hours)
8/12/2024	35	13.0	3575.0	"Attendance at trial in Judge Pepper's court - began with discussion on recent motion and then completed voir dire, openings, officer Serres testimony, and officer Walker testimony, and officer Elfman testimony, discussed with court how rulings on objections from trial deposition should be handled; preparation for day 2 of trial - edit outline for officer Carlson and review outline for direct of Wendricks."
8/12/2024	36	7.0	1925.0	Attendance at first day of trial: pretrial conference addressed defendants' motion to strike and other pretrial matters; conduct voir dire and continue trial and call first two witnesses.
8/12/2024	36	4.4	1210.0	Preparation pre-trial with Andrea N. Panozzo; preparation during lunch break to remedy issues with exhibit presentation; after trial preparation for next day, revise outlines based on cross examinations; prepare initial closing arguments; review possible evidentiary issues with client's pending testimony.
8/12/2024	36	2.0	550.0	Went through entirety of expert depositions to highlight and identify objections as per request by court; send draft to opposing counsel.
8/13/2024	24	1.5	660.0	Review witness outlines with Wesley E. Haslam and Andrea N. Panozzo; discuss trial strategy for opposing witnesses; discuss Tina Houston testimony; get copies of transcript with highlighting e-mailed to the Court; discuss trial strategy with Andrea N. Panozzo and Wesley E. Haslam during breaks; discuss closing statement strategy with Wesley E. Haslam. (Reduced from 10.2 to 1.5 hours)
8/13/2024	35	10.0	2750.0	"Preparation for second day of trial and review and continue to edit outlines; attended day two of trial in Judge Pepper's court - addressed the deposition transcripts, testimony of Officer Carlson, testimony of Officer Reetz, testimony of expert Tina Houston, testimony of Terrel Wendricks; discuss strategies of closings."
8/13/2024	36	15.2	4180.0	Attendance at second day of trial: complete witness testimony, including read-in of deposition of expert; post-trial conference addressing various issues with objections in deposition transcripts.
8/13/2024	56	.3	67.5	Review and revise use of force chart; conference with Wesley E. Haslam regarding same.
8/14/2024	24	2.3	1012.0	"Review and revise Wesley E. Haslam's opening; discuss how to argue about expert testimony; discuss giving up Serres and Reetz as liable defendants; attend instructions and closing arguments; back and forth to court for jury questions; wait for verdict." (Reduced from 9.3 to 2.3 hours)

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**Attorney's Fee Breakdown Chart**

8/14/2024	35	3.5	962.5	"Preparation of evidence that had been admitted on flash drive to give to court; attend day three of trial in Judge Pepper's court for closings; awaited jury verdict and answered jury questions; looked into 1988 attorney's fees." (Reduced from 6.0 to 3.5 to take away time waiting for verdict)
8/14/2024	36	4.3	1182.5	Preparation for trial - closing statement review and practice.
8/14/2024	36	2.3	632.5	Attendance at day 3 of trial, closing statements; review of jury instructions; etc.
8/14/2024	36	.4	110.0	Review of Rule 50 and 59 in anticipation of Jury verdict.
8/14/2024	36	1.5	412.5	Time spent answering jury questions, conferring with client, discussing post-trial procedures.
8/14/2024	36	1.9	522.5	Jury decision; discussion with co-counsel and client explaining what the decision means and the likely steps defendants may take.
8/20/2024	36	2.7	0.0	Draft petition for attorney's fees; read Farrar in its entirety and 7th Circuit cases citing Farrar; revise brief outline. (No Charge)
8/21/2024	36	.7	0.0	Review sample briefs for attorney fees; review court response; incorporate portions of brief into draft for present brief. (No Charge)